

1 SO. CAL. EQUAL ACCESS GROUP  
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5 Attorneys for Plaintiff,  
DENNIS COOPER

6  
7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9

10 DENNIS COOPER,

11 Plaintiff,

12 vs.  
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14 THE PROFESSIONAL  
MANAGEMENT PLUS TEAM;  
15 MARTHA A LYNN, AS TRUSTEE  
16 OF THE MERRILL-LYNN FAMILY  
TRUST; and DOES 1 to 10,

17  
18 Defendants.  
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**Case No.: 5:25-cv-01353-DTB**

**JOINT STIPULATION FOR  
DISMISSAL PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 41(a)(1)(A)(ii)**

20 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
21 Attorneys for Plaintiff DENNIS COOPER (“Plaintiff”) and Defendants THE  
22 PROFESSIONAL MANAGEMENT PLUS TEAM and MARTHA A LYNN, AS  
23 TRUSTEE OF THE MERRILL-LYNN FAMILY TRUST stipulate and jointly  
24 request that this Court dismiss the above-captioned action, with prejudice, in its  
25 entirety. Each party shall bear his/her/its own costs and attorneys’ fees.

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6 Respectfully submitted,

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8 DATED: October 30, 2025

SO. CAL. EQUAL ACCESS GROUP

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10 By: /s/ Jason J. Kim  
11 Jason J. Kim  
12 Attorneys for Plaintiff

13 DATED: October 30, 2025

LAW OFFICE OF DAVID PHILIPSON

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15 By: /s/ David Philipson  
16 David Philipson, Esq.  
17 Attorneys for Defendants  
18 THE PROFESSIONAL MANAGEMENT  
19 PLUS TEAM; MARTHA A LYNN, AS  
20 TRUSTEE OF THE MERRILL-LYNN  
21 FAMILY TRUST

**Certification Pursuant to Local Rule 5-4.3.4(a)(2)(i)**

22 Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Jason J. Kim, do attest that all  
23 signatories listed, and on whose behalf the filing is submitted, concur in the filing's  
24 content and have authorized the filing.

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26 Dated: October 30, 2025

By: /s/ Jason J. Kim  
Jason J. Kim

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